

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

In re:

Wisconsin & Milwaukee Hotel LLC,

Debtor.

Case No. 24-21743-gmh
Chapter 11

**MOTION TO SHORTEN NOTICE OF APPLICATION
FOR ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT
OF MALLERY S.C. AS SPECIAL COUNSEL FOR A SPECIFIC PURPOSE,
EFFECTIVE AS OF MARCH 31, 2025**

Wisconsin & Milwaukee Hotel LLC, the debtor herein (“**Debtor**” or “**WMH**”), by its attorneys Richman & Richman LLC, by Michael P. Richman and Claire Ann Richman, hereby moves the Court, pursuant to Fed. R. Bankr. P. 9006(c)(1), for entry of an order shortening notice of the Debtor’s Application for Order Authorizing the Retention and Employment of Mallery S.C. as Special Counsel for a Specific Purpose, Effective as of March 31, 2025 (“**App to Employ Mallery**”), to four (4) days, rather than fourteen (14) days’ notice otherwise required, directing that any objection to the App to Employ Mallery be received by Friday, April 4, 2025, and setting a hearing for the App to Employ Mallery for April 7, 2025 (“**Motion to Shorten Notice**”). In support of the Motion to Shorten Notice, the Debtor states as follows below. This Motion is further supported by the record herein.

1. The Debtor is filing contemporaneously herewith the App to Employ Mallery pursuant to Sections 327 and 330 of the United States Bankruptcy Code (“**Bankruptcy Code**”), Rules 2014 and 2016 of the Federal Rules of Bankruptcy

Procedure (“**Bankruptcy Rules**”), and Local Rule 2014 of the United States Bankruptcy Court for the Eastern District of Wisconsin (the “**Local Rules**”), seeking authorization for the Debtor to retain and employ Mallery s.c. (“**Mallery**”), as special counsel for the Debtor for a specific purpose effective as of March 31, 2025.

2. As more fully described in the App to Employ Mallery, the Debtor is currently engaged in negotiations of a management agreement (“**Management Agreement**”) with a new property manager to replace White Lodging Services Corporation, and expects imminently to engage Marriott International in negotiations for an amended franchise agreement (“**Franchise Agreement**”). Mallery’s corporate law expertise and familiarity with the existing White Lodging Management Agreement and the Franchise Agreement, and related experience, will afford the Debtor a substantively advantageous and cost-effective ability to complete such matters in a relatively short period of time, so that relevant details of the new or updated agreements can be known in connection with the ongoing disclosure statement and plan process.

3. Pursuant to Local Rule 2014(c)(2), applications for employment under Section 327 of the Bankruptcy Code must serve the application “with notice of a 14-day objection period, unless the court shortens the time for cause shown.”

4. Through this Motion to Shorten Notice, pursuant to Fed. R. Bankr. P. 9006(c)(1), the Debtor requests that the Court shorten the notice period of the App to Employ Mallery to four (4) days’ notice, rather than the fourteen (14) days’ notice provided by Local Rule 2014(c)(2), requiring any objection to the App to Employ

Mallery be received by Friday, April 4, 2025, and setting a hearing for the App to Employ Mallery for April 7, 2025, in order to assure that the Management Agreement and Franchise Agreement negotiations and documentation can be completed in tandem with the ongoing disclosure statement and plan process.

WHEREFORE, Wisconsin & Milwaukee Hotel LLC respectfully requests that the Court enter an order (1) shortening notice of the Debtor's Application for Order Authorizing the Retention and Employment of Mallery S.C. as Special Counsel for a Specific Purpose, Effective as of March 31, 2025 from fourteen (14) days' notice to four (4) days' notice, (2) requiring any objection to the App to Employ Mallery be received by Friday, April 4, 2025, and (3) setting a hearing for the App to Employ Mallery for April 7, 2025.

Dated: March 31, 2025

RICHMAN & RICHMAN LLC
Attorneys for Debtor

By: /s/ Michael P. Richman

Michael P. Richman
Claire Ann Richman
Eliza M. Reyes
122 West Washington Avenue, Suite 850
Madison, WI 53703
Tel: (608) 630-8990
Fax: (608) 630-8991
mrichman@RandR.law
crichman@RandR.law
ereyes@RandR.law